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through partnership

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June 12, 2020

**RE: *Roc Nation, LLC v. HCC International Insurance Company, PLC*; Case No.: 1:19-cv-00554**

Dear Judge Engelmayer:

We write to request permission, pursuant to Section 4(B) of Your Honor's Individual Rules and Practices, to redact and to file under seal a number of exhibits to Roc Nation's letter request that the pre-motion/pretrial conference serve as a pre-motion conference pursuant to Section 3.H of the Court's Individual Rules.

The Stipulated Confidentiality Agreement and Protective Order in this case [ECF No. 43] (the "Protective Order") allows counsel to designate deposition testimony as Confidential under Section 4. This obligates the party to file that confidential testimony under seal. Roc Nation's letter attaches excerpts from six (6) deposition transcripts each marked confidential: Exhibits E, H, I, K, L and M. In addition, Exhibit M includes an excerpt from a deposition exhibit (36) that was marked and discussed in a deposition marked confidential. Exhibit 36 also includes confidential proprietary information of Roc Nation, including values asserted in confidential settlement discussions (the "Amount claimed by Plaintiff") and references to confidential agreements revealing private information exchanged in discovery pursuant to the confidentiality agreement and exchanged to explore settlement.

Similarly, Section 2 of the Protective Order permits any party to designate documents as "Confidential" where necessary to protect its interests in proprietary or otherwise sensitive non-public information. It also contains an internal Confidentiality obligation in Section 6 of that document which obligates Roc Nation to make this request. Exhibits A, B, C, D and J all satisfy this requirement, containing confidential business information of Roc Nation, CAM and Roc Nation's purchase of CAM that were never intended to be disclosed publicly or to Roc Nation's or CAM's industry competitors. Additionally, Exhibit N is HCC's interrogatory response served today, which includes references to and summaries of proprietary and non-public financial information that was exchanged as confidential pursuant to the Protective Order in this case which will be redacted from the public filing. Roc Nation also seeks permission to redact substantive discussions of this proprietary and confidential information from the letter request and file the unredacted version under seal.

Roc Nation also requests to file Exhibit F under seal, which is the Amended Death Certificate of Jordan Feldstein, containing private personal information concerning a non-party that Roc Nation does not have authority to disclose publicly. It has also been marked confidential pursuant to the Protective Order.

Good cause exists for granting this request. The request is submitted under the terms and for the reasons set forth the Protective Order, and the parties understood that their confidentiality designations would apply when they were exchanging information and taking depositions in order to avoid objections preventing the disclosure of material that would be relevant in discovery and for settlement discussions, but which the parties would not agree to make publicly available. Furthermore, Roc Nation has attempted to narrow this request to the extent possible.

Very truly yours,

/s/ Amber Finch

Amber S. Finch

Granted.

SO ORDERED.

  
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PAUL A. ENGELMAYER

United States District Judge

June 17, 2020